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Remarks

The Office Action mailed May 7, 2003 has been carefully reviewed and the following remarks are made in consequence thereof.

Claims 1-72 are pending in this application. Claims 1-72 stand rejected. Claims 1, 19, 28, 46, 55, and 64 have been amended. No new matter has been added.

The rejection of Claims 1-6, 9-11, 13, 16, 18-23, 25-33, 36-38, 40, 43, 45-50, 52-59, 61-68, and 70-72 under 35 U.S.C. § 102(e) as being anticipated by Storch et al. (U.S. Patent 5,920,846) is respectfully traversed.

Storch et al. describe data processing systems for processing a service request relating to any locally switched telecommunication service using improved nondesign systems and processes (column 1, lines 9-13). In the data processing systems, an order taker person (252) or customer inputs customer information into a computer order entry system (254) such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested (column 54, lines 1-4). Either the computer order entry system or the order taker person accesses a computer data processing system known in the art such as Premises Information System (PREMIS) (256) that is sold by Bell Communications Research, Inc. (Bellcore), and contains address-based information stored in associated databases in its computer memory (column 54, lines 5-11). The information stored in PREMIS includes customer service address, a central office serving each address, the type and designation of an NE (236) serving that customer address, and the types of services provided by the central office serving that address (column 54, lines 11-14). PREMIS assists in generating a service order by validating the customer's address, and verifying any telecommunications company services currently associated with that customer address (column 54, lines 14-17).

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Claim 1 recites a method of enabling scheduling of a service call in a computing environment, the method including "obtaining product information from a user of the computing environment; and automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being".

Storch et al. does not describe or suggest a method of enabling scheduling of a service call in a computing environment, the method including obtaining product information from a user of the computing environment; and automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, Storch et al. does not describe or suggest a method including automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested. For the reasons set forth above, Claim 1 is submitted to be patentable over Storch et al.

Claims 2-6, 9-11, 13, 16, and 18 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-6, 9-11, 13, 16, and 18 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-6, 9-11, 13, 16, and 18 likewise are patentable over Storch et al.

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Claim 19 recites a method of enabling scheduling of a service call for repair of a home appliance in a computing environment, the method including "obtaining product information at a first computing unit from input of the product information by a user at a second computing unit coupled to the first computing unit via a communications network; and automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being".

Storch et al. does not describe or suggest a method of enabling scheduling of a service call for repair of a home appliance in a computing environment, the method including obtaining product information at a first computing unit from input of the product information by a user at a second computing unit coupled to the first computing unit via a communications network, and automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, Storch et al. does not describe or suggest a method including automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested. For the reasons set forth above, Claim 19 is submitted to be patentable over Storch et al.

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Claims 20-23 and 25-27 depend, directly or indirectly, from independent Claim 19. When the recitations of Claims 20-23 and 25-27 are considered in combination with the recitations of Claim 19, Applicants submit that dependent Claims 20-23 and 25-27 likewise are patentable over Storch et al.

Claim 28 recites a system for enabling scheduling of a service call in a computing environment, the system including "at least one processor adapted to obtain product information from a user of the computing environment; and said at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information".

Storch et al. does not describe or suggest a system for enabling scheduling of a service call in a computing environment, the system including at least one processor adapted to obtain product information from a user of the computing environment, and the at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information.

Moreover, Storch et al. does not describe or suggest a system including at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested. For the reasons set forth above, Claim 28 is submitted to be patentable over Storch et al.

Claims 29-33, 36-38, 40, 43, and 45 depend, directly or indirectly, from independent Claim 28. When the recitations of Claims 29-33, 36-38, 40, 43, and 45 are

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considered in combination with the recitations of Claim 28, Applicants submit that dependent Claims 29-33, 36-38, 40, 43, and 45 likewise are patentable over Storch et al.

Claim 46 recites a system for enabling scheduling of a service call for repair of a home appliance in a computing environment, the system including "means for obtaining product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network; and means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein the means for providing provides without interaction between the user and any other human being".

Storch et al. does not describe or suggest a system for enabling scheduling of a service call for repair of a home appliance in a computing environment, the system including means for obtaining product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network, and means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein the means for providing provides without interaction between the user and any other human being.

Moreover, Storch et al. does not describe or suggest a system including means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested. For the reasons set forth above, Claim 46 is submitted to be patentable over Storch et al.

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Claims 47-50 and 52-54 depend, directly or indirectly, from independent Claim 46. When the recitations of Claims 47-50 and 52-54 are considered in combination with the recitations of Claim 46, Applicants submit that dependent Claims 47-50 and 52-54 likewise are patentable over Storch et al.

Claim 55 recites at least one program storage device readable by a machine, tangibly embodying at least one program of instructions executable by the machine to perform a method of enabling scheduling a service call, the method including "obtaining product information from a user; and automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being".

Storch et al. does not describe or suggest at least one program storage device readable by a machine, tangibly embodying at least one program of instructions executable by the machine to perform a method of enabling scheduling a service call, the method including obtaining product information from a user, and automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, Storch et al. does not describe or suggest a method including automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's

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address, and the type of service requested. For the reasons set forth above, Claim 55 is submitted to be patentable over Storch et al.

Claims 56-59 and 61-63 depend, directly or indirectly, from independent Claim 55. When the recitations of Claims 56-59 and 61-63 are considered in combination with the recitations of Claim 55, Applicants submit that dependent Claims 56-59 and 61-63 likewise are patentable over Storch et al.

Claim 64 recites an article of manufacture including "at least one computer usable medium having computer readable program code means embodied therein for causing the scheduling of a service call for repair of a home appliance, the computer readable program code means in said article of manufacture comprising: computer readable program code means for causing a computer to obtain product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network; and computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information".

Storch et al. does not describe or suggest an article of manufacture including at least one computer usable medium having computer readable program code means embodied therein for causing the scheduling of a service call for repair of a home appliance, the computer readable program code means in said article of manufacture including computer readable program code means for causing a computer to obtain product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network, and computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second

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computing unit at least one available appointment for scheduling a service call based on the product information.

Moreover, Storch et al. does not describe or suggest an article of manufacture including computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested. For the reasons set forth above, Claim 64 is submitted to be patentable over Storch et al.

Claims 65-68 and 70-72 depend, directly or indirectly, from independent Claim 64. When the recitations of Claims 65-68 and 70-72 are considered in combination with the recitations of Claim 64, Applicants submit that dependent Claims 65-68 and 70-72 likewise are patentable over Storch et al.

For the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1-6, 9-11, 13, 16, 18-23, 25-33, 36-38, 40, 43, 45-50, 52-59, 61-68, and 70-72 be withdrawn.

The rejection of Claims 7, 8, 12, 14, 15, 17, 24, 34, 35, 39, 41, 42, 44, 51, 60, and 69 under 35 U.S.C. § 103(a) as being unpatentable over Storch et al. in view of "GE Answer Center" that includes articles "GEA: Making Things Happen-Consumer Friendly", referred to herein as reference A, "Connected to Consumers", referred to herein as reference B, "Benefiting from the 'Net", referred to herein as reference C, and ""GE Answers Call to Evolve 10-Year-Old Help Line", referred to herein as reference D, is respectfully traversed.

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Reference A describes a GE Answer Center that expected one million calls per year when it opened its doors 10 years ago with 25 customer service representatives (Abstract). Today, the center's 225 reps field approximately 3.6 million calls annually (Abstract). Calls are evenly divided among 3 categories: 1. Prepurchase, 2. post-purchase, and 3. do-it-yourself (Abstract). In an initiative to grow its out-of-warranty service business, GE Consumer Service is launching a nationwide program in 1992 offering same-day or next-day service through yellow pages advertising campaign (Abstract).

Reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products (page 2).

Reference C describes a 16-year-old, Louisville KY-based consumer-product-oriented General Electric Co (GE) Answer Center operates 24 hours a day to field people's questions about their appliances (Abstract). Roughly 45% of the inquiries it now receives arrive via the Web, helping call centers gain a competitive edge (Abstract).

Reference D describes a General Electric Co (GE) Answer Center (Louisville, Kentucky) that eliminates the frustrating customer service runaround by offering one-call customer service (Abstract). Behind the effectiveness of the GE Answer Center is a text database containing more than one million problem-resolution responses (Abstract). Any of these can be called up in less than 2 seconds (Abstract). The system also contains continually updated files of product, dealer, service, parts, and merchandising information (Abstract). If a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires (page 2).

References A, B, C, and D describe GE Answer Center and therefore, as used herein, GE Answer Center refers collectively to references A, B, C, and D.

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Claims 7, 8, 12, 14, 15, and 17 depend, directly or indirectly, from independent Claim 1 which recites a method of enabling scheduling of a service call in a computing environment, the method including "obtaining product information from a user of the computing environment; and automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a method of enabling scheduling of a service call in a computing environment, the method including obtaining product information from a user of the computing environment; and automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a method including automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call

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centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

For the reasons set forth above, Claim 1 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claims 7, 8, 12, 14, 15, and 17 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 7, 8, 12, 14, 15, and 17 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 7, 8, 12, 14, 15, and 17 likewise are patentable over Storch et al. in view of GE Answer Center.

Claim 24 depends from independent Claim 19 which recites a method of enabling scheduling of a service call for repair of a home appliance in a computing environment, the method including "obtaining product information at a first computing unit from input of the product information by a user at a second computing unit coupled to the first computing unit via a communications network; and automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a method of enabling scheduling of a service call for repair of a home appliance in a computing environment, the method including obtaining product information at a first computing unit from input of the product information by a user at a second computing unit coupled to the first computing unit via a communications network, and automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information,

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wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, none of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a method including automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

For the reasons set forth above, Claim 19 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claim 24 depends from independent Claim 19. When the recitations of Claim 24 are considered in combination with the recitations of Claim 19, Applicants submit that dependent Claim 24 likewise is patentable over Storch et al. in view of GE Answer Center.

Claims 34, 35, 39, 41, 42, and 44 depend, directly or indirectly, from independent Claim 28 which recites a system for enabling scheduling of a service call in a computing

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environment, the system including "at least one processor adapted to obtain product information from a user of the computing environment; and said at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a system for enabling scheduling of a service call in a computing environment, the system including at least one processor adapted to obtain product information from a user of the computing environment, and the at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information.

Moreover, none of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a system including at least one processor adapted to provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

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For the reasons set forth above, Claim 28 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claims 34, 35, 39, 41, 42, and 44 depend, directly or indirectly, from independent Claim 28. When the recitations of Claims 34, 35, 39, 41, 42, and 44 are considered in combination with the recitations of Claim 28, Applicants submit that dependent Claims 34, 35, 39, 41, 42, and 44 likewise are patentable over Storch et al. in view of GE Answer Center.

Claim 51 depends from independent Claim 46 which recites a system for enabling scheduling of a service call for repair of a home appliance in a computing environment, the system including "means for obtaining product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network; and means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein the means for providing provides without interaction between the user and any other human being".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a system for enabling scheduling of a service call for repair of a home appliance in a computing environment, the system including means for obtaining product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network, and means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein the means for providing provides without interaction between the user and any other human being.

Moreover, none of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a system including means for providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

For the reasons set forth above, Claim 46 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claim 51 depends from independent Claim 46. When the recitations of Claim 51 are considered in combination with the recitations of Claim 46, Applicants submit that dependent Claim 51 likewise is patentable over Storch et al. in view of GE Answer Center.

Claim 60 depends from independent Claim 55 which recites at least one program storage device readable by a machine, tangibly embodying at least one program of instructions executable by the machine to perform a method of enabling scheduling a service call, the method including "obtaining product information from a user; and automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product

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information, wherein automatically providing includes providing without interaction between the user and any other human being".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest at least one program storage device readable by a machine, tangibly embodying at least one program of instructions executable by the machine to perform a method of enabling scheduling a service call, the method including obtaining product information from a user, and automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being.

Moreover, none of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest a method including automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

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For the reasons set forth above, Claim 55 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claim 60 depends from independent Claim 55. When the recitations of Claim 60 are considered in combination with the recitations of Claim 55, Applicants submit that dependent Claim 60 likewise is patentable over Storch et al. in view of GE Answer Center.

Claim 69 depends from independent Claim 64 which recites an article of manufacture including "at least one computer usable medium having computer readable program code means embodied therein for causing the scheduling of a service call for repair of a home appliance, the computer readable program code means in said article of manufacture comprising: computer readable program code means for causing a computer to obtain product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network; and computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information".

None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest an article of manufacture including at least one computer usable medium having computer readable program code means embodied therein for causing the scheduling of a service call for repair of a home appliance, the computer readable program code means in said article of manufacture including computer readable program code means for causing a computer to obtain product information at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network, and computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second

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computing unit at least one available appointment for scheduling a service call based on the product information.

Moreover, none of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest an article of manufacture including computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information. Rather, Storch et al. describe that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A describes that the center's 225 reps field approximately 3.6 million calls annually, reference B describes that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C describes that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D describes that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires.

For the reasons set forth above, Claim 64 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Claim 69 depends from independent Claim 64. When the recitations of Claim 69 are considered in combination with the recitations of Claim 64, Applicants submit that dependent Claim 69 likewise is patentable over Storch et al. in view of GE Answer Center.

Moreover, Applicants respectfully submit that the Section 103 rejection of Claims 7, 8, 12, 14, 15, 17, 24, 34, 35, 39, 41, 42, 44, 51, 60, and 69 is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the

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cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Storch et al., reference A, reference B, reference C, and reference D, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Storch et al. with any of references A, B, C, and D because there is no motivation to combine the references suggested in the art.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Storch et al. is cited for its teaching that the order taker person or customer inputs customer information into the computer order entry system such as the customer's name and phone number (if applicable), the customer's address, and the type of service requested, reference A is cited for its teaching that the center's 225 reps field approximately 3.6

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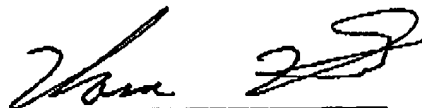VIA FACSIMILE 1-703-872-9326

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million calls annually, reference B is cited for its teaching that work puts Castine and his staff on the front line with consumers every day, as they learn what consumers like and dislike about GEA products, reference C is cited for its teaching that roughly 45% of the inquiries the GE Answer Center now receives arrive via the Web, helping call centers gain a competitive edge, and reference D is cited for its teaching that if a fix requires a trained service technician, the caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires. Since there is no teaching nor suggestion in the cited art for the combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 7, 8, 12, 14, 15, 17, 24, 34, 35, 39, 41, 42, 44, 51, 60, and 69 be withdrawn.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 7, 8, 12, 14, 15, 17, 24, 34, 35, 39, 41, 42, 44, 51, 60, and 69 be withdrawn.

In view of the foregoing remarks, this application is believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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